

1 LAW OFFICES OF STEPHENSON, ACQUISTO &
2 COLMAN
3 500 North Brand Blvd, Suite 1450
Glendale, CA 91203
(818) 559-4477

4
5 SCOTT B. VAN ALFEN (NEVADA BAR 5532)
LOCAL COUNSEL
6 690 Magnum Ct.
Henderson, NV 89052
7 (818) 559-4477
Svalfen@sacfirm.com

8
9
10 Attorney for Plaintiffs, DIGNITY HEALTH, a
California non-profit public benefit corporation, d/b/a
11 ST. ROSE DOMINICAN HOSPITAL-SIENA
CAMPUS

12
13
14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16
17 DIGNITY HEALTH, a California non-
profit public benefit corporation, d/b/a ST.
18 ROSE DOMINICAN HOSPITAL,

19 Plaintiff,

20 vs.

21 SILVERSUMMIT HEALTH PLAN, INC.;
DOES 1 THROUGH 25; AND ROES 1
22 THROUGH 25,

23 Defendants.

24 Case No.: 2:25-cv-00576-JAD-EJY
25 STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
RESPOND TO DEFENDANT'S MOTION
TO DISMISS BY NOT MORE THAN 10
DAYS (L.R. 6-1)
(FIRST REQUEST TO EXTEND)

26
27
28
REMOVAL served: 03/28/25
Defendant's Motion
To Dismiss Filed 04/04/25
Current response date: 04/18/25
New response date: 04/28/25

1 Pursuant to Local Rule 6-1, Plaintiff, DIGNITY HEALTH (“DIGNITY”), and
2 Defendant, SILVERSUMMIT HEALTH PLAN, INC. (“SILVERSUMMIT”), by and
3 through their respective counsel of record, hereby stipulate as follows:
4

5 WHEREAS, DIGNITY served its Complaint in State Court, which was then
6 Removed to Federal Court on March 28, 2025, and SILVERSUMMIT filed its Motion to
7 Dismiss on April 4, 2025;

8 WHEREAS, the parties have been engaged in discussions to determine whether
9 this matter should be resolved in court or in arbitration in light of the existence of other
10 disputes between the parties for which DIGNITY has submitted an arbitration demand;

12 WHEREAS, DIGNITY currently has until April 18, 2025, to file its Response to
13 SILVERSUMMIT’S Motion to Dismiss, and this Stipulation would extend the deadline
14 by not more than 10 days through and including April 28, 2025;

16 WHEREAS, this is the first time DIGNITY has requested an extension of time to
17 file its Response;

18 WHEREAS, good cause exists to extend the deadline in light of the parties’
19 discussions referenced above;

21 ///

22 ///

23 ///

25

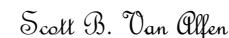
27

28

1 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties,
2 through their respective counsel, **that DIGNITY shall file its Response to**
3 **SILVERSUMMIT's Motion to Dismiss by end of day April 28, 2025.**
4

5 Dated: April 17th, 2025
6

7 STEPHENSON, ACQUISTO & COLMAN
8

9 
10

11 SCOTT B. VAN ALFEN
12 Attorney for
13 DIGNITY HEALTH
14

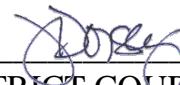
15 Dated: April 17, 2025
16

17 KAEMPFER CROWELL
18

19 
20

21 LOUIS M. BUBALA III
22 Attorney for
23 SILVERSUMMIT HEALTH PLAN, INC.
24

25 IT IS SO ORDERED,
26

27 By: 
28 U.S. DISTRICT COURT JUDGE

29 Dated this 22nd day of April, 2025.
30